AIR QUALITY PERMIT

Issued To: Lodge Creek Pipelines, LLC
Signal Butte Compressor Station
P.O. Box 40
Havre, MT 59501

Permit: #3345-02
Application Complete: 06/19/06
Preliminary Determination Issued: 7/18/06
Department's Decision Issued: 08/03/06
Permit Final: 08/19/06
AFS: # 041-0010

An air quality permit, with conditions, is hereby granted to Lodge Creek Pipelines, LLC - Signal Butte Compressor Station (LCP), pursuant to Sections 75-2-204 and 211 of the Montana Code Annotated (MCA), as amended, and Administrative Rules of Montana (ARM) 17.8.740, *et seq*., as amended, for the following:

SECTION I: Permitted Facilities

A. Plant Location

The facility is located near Havre, Montana. The legal description of the facility is the SE¼ of the SW¼ of Section 35, Township 37 North, Range 15 East, in Hill County, Montana.

B. Current Permit Action

On June 9, 2006, the Department of Environmental Quality (Department) received an application for the addition of a lean-burn compressor engine up to 1,341 horsepower (hp) equipped with an oxidation catalyst and an air-fuel ratio (AFR) controller. The application was deemed complete on June 19, 2006. The current Permit #3345-02 replaces Permit #3345-01.

SECTION II: Conditions and Limitations

A. Emission Limitations

1. LCP shall not operate more than four rich-burn compressor engines at any given time and each engine shall have a maximum rated design capacity equal to, or less than 380 hp (ARM 17.8.749).

2. Emissions from each of the rich-burn engines shall be controlled with a non-selective catalytic reduction (NSCR) unit and an AFR controller and emissions from each of the engines shall not exceed the following limits (ARM 17.8.752):

   Emission Limit (pounds per hour (lb/hr)) = Emission Factor (grams per brake horsepower-hour (g/bhp-hr)) * maximum rated capacity of engine (bhp) * 0.002205 pounds per gram (lb/g).

Nitrogen Oxides (NO_X)[1]	1.0 g/bhp-hr
Carbon Monoxide (CO)	1.0 g/bhp-hr
Volatile Organic Compound (VOC)	0.5 g/bhp-hr

[1] NO_X reported as NO_2.

3. LCP shall not operate more than two lean-burn compressor engines at any given time and the engines shall each have a maximum rated design capacity equal to, or less than, 1,341 hp (ARM 17.8.749).

4. Emissions from each of the lean-burn engines shall be controlled with an oxidation catalyst and an AFR controller, and emissions from each of the engines shall not exceed the following limits (ARM 17.8.752):

   Emission Limit (lb/hr) = Emission Factor (g/bhp-hr) * maximum rated capacity of engine (bhp) * 0.002205 lb/g.

NO_X	1.0 g/bhp-hr
CO	0.5 g/bhp-hr
VOC	0.5 g/bhp-hr

5. LCP shall operate all equipment to provide the maximum air pollution control for which it was designed (ARM 17.8.752).

6. LCP shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any sources installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over six consecutive minutes (ARM 17.8.304).

7. LCP shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter (ARM 17.8.308).

8. LCP shall treat all unpaved portions of the haul roads, access roads, parking lots, or general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precautions limitation in Section II.A.7 (ARM 17.8.749).

B. Testing Requirements

1. Each of the four rich-burn compressor engines shall be initially tested for NO_X and CO, concurrently, to demonstrate compliance with the emission limits in Section II.A.2, within 180 days of the initial start up date of the compressor engines. Further testing shall continue on an every five-year basis or according to another testing/monitoring schedule as may be approved by the Department (ARM 17.8.105 and ARM 17.8.749).

2. The lean-burn compressor engines shall be initially tested for NO_X and CO, concurrently, to demonstrate compliance with the emission limits in Section II.A.4, within 180 days of the initial start up date of the compressor engines. Further testing shall continue on an every four-year basis or according to another testing/monitoring schedule as may be approved by the Department (ARM 17.8.105 and ARM 17.8.749).

3. All compliance source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).

4. The Department may require further testing (ARM 17.8.105).

C. Operational Reporting Requirements

1. LCP shall supply the Department with annual production information for all emission points, as required by the Department, in the annual emission inventory request. The request will include, but is not limited to, all sources of emissions identified in the emission inventory contained in the permit analysis.

   Production information shall be gathered on a calendar-year basis, and submitted to the Department by the date required in the emission inventory request. Information shall be in the units required by the Department. This information may be used to calculate operating fees, based on actual emissions from the facility, and/or to verify compliance with permit limitations (ARM 17.8.505).

2. LCP shall notify the Department of any construction or improvement project conducted pursuant to ARM 17.8.745, that would include a change in control equipment, stack height, stack diameter, stack flow, stack gas temperature, source location or fuel specifications, or would result in an increase in source capacity above it's permitted operation or the addition of a new emission unit. The notice must be submitted to the Department, in writing, 10 days prior to start up or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change, and must include the information requested in ARM 17.8.745(1)(d) (ARM 17.8.745).

3. All records compiled in accordance with this permit must be maintained by LCP as a permanent business record for at least five years following the date of the measurement, must be available at the plant site for inspection by the Department, and must be submitted to the Department upon request (ARM 17.8.749).

D. Notification

   LCP shall provide the Department with written notification of the actual start-up date(s) of the compressor engine(s) within 15 days after the actual start-up date(s). The notification shall include the engine model and maximum rated design capacity (ARM 17.8.749).

SECTION III: General Conditions

A. Inspection – LCP shall allow the Department's representatives access to the source at all reasonable times for the purpose of making inspections or surveys, collecting samples, obtaining data, auditing any monitoring equipment (CEMS, CERMS) or observing any monitoring or testing, and otherwise conducting all necessary functions related to this permit.

B. Waiver – The permit and the terms, conditions, and matters stated herein shall be deemed accepted if LCP fails to appeal as indicated below.

C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving LCP of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq*. (ARM 17.8.756).

D. Enforcement – Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties or other enforcement action as specified in Section 75-2-401, *et seq*., MCA.

E. Appeals – Any person or persons jointly or severally adversely affected by the Department's decision may request, within 15 days after the Department renders its decision, upon affidavit setting forth the grounds therefore, a hearing before the Board of Environmental Review (Board). A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The filing of a request for a hearing does not stay the Department's decision, unless the Board issues a stay upon receipt of a petition and a finding that a stay is appropriate under Section 75-2-211(11)(b), MCA. The issuance of a stay on a permit by the Board postpones the effective date of the Department's decision until conclusion of the hearing and issuance of a final decision by the Board. If a stay is not issued by the Board, the Department's decision on the application is final 16 days after the Department's decision is made.

F. Permit Inspection – As required by ARM 17.8.755, Inspection of Permit, a copy of the air quality permit shall be made available for inspection by the Department at the location of the source.

G. Permit Fee – Pursuant to Section 75-2-220, MCA, as amended by the 1991 Legislature, failure to pay the annual operation fee by LCP may be grounds for revocation of this permit, as required by that section and rules adopted thereunder by the Board.

H. Construction Commencement – Construction must begin within three years of permit issuance and proceed with due diligence until the project is complete or the permit shall be revoked (ARM 17.8.762).

Permit Analysis
Lodge Creek Pipelines, LLC
Signal Butte Compressor Station
Permit #3345-02

I. Introduction/Process Description

Lodge Creek Pipelines, LLC (LCP) is permitted for the construction and operation of the Signal Butte Compressor Station. The facility is a natural gas compressor station located near the town of Havre, in the SE¼ of the SW¼ of Section 35, Township 37 North, Range 15 East, in Hill County, Montana.

A. Permitted Equipment

The facility consists of up to four rich-burn engines having a maximum rated design capacity equal to, or less than 380 horsepower (hp) with a non-selective catalytic reduction (NSCR) unit and an air-fuel ratio (AFR) controller. The facility also consists of up to two lean-burn engines each having a maximum rated design capacity equal to, or less than 1,341 hp with an oxidation catalyst and an AFR controller.

B. Source Description

The LCP – Signal Butte Compressor Station compresses and transports natural gas from the nearby gas field for transmission through the natural gas pipeline.

C. Permit History

On September 14, 2004, LCP was issued air quality Permit **#3345-00** for a compressor station and associated equipment.

On July 19, 2005, the Department of Environmental Quality (Department) received a complete application from LCP requesting a change to air quality Permit #3345-00. The proposed change included adding a lean-burn compressor engine equal to or less than 1,341 hp equipped with an oxidation catalyst and an AFR controller. Permit **#3345-01** replaced Permit #3345-00.

D. Current Permit Action

On June 9, 2006, the Department received an application for the addition of a lean-burn compressor engine up to 1,341 hp equipped with an oxidation catalyst and an AFR controller. In addition, LCP requested to modify the nitrogen oxide (NO_x) limit for both the new and the existing lean-burn engine to 1.5 grams per brake horsepower-hour (g/bhp-hr) to reflect the limit guaranteed by the compressor manufacturer. However, in the Department's opinion, the previous NO_x limit of 1.0 g/bhp-hr represents the Best Available Control Technology (BACT) limit, and was not revised. The application was deemed complete on June 19, 2006. Permit #**3345-02** replaces Permit #3345-01.

II. Applicable Rules and Regulations

The following are partial explanations of some applicable rules and regulations that apply to the facility. The complete rules are stated in the Administrative Rules of Montana (ARM) and are available, upon request, from the Department. Upon request, the Department will provide references for location of complete copies of all applicable rules and regulations or copies where appropriate.

A. ARM 17.8, Subchapter 1 – General Provisions, including but not limited to:

1. ARM 17.8.101 Definitions. This rule includes a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.

2. ARM 17.8.105 Testing Requirements. Any person or persons responsible for the emission of any air contaminant into the outdoor atmosphere shall, upon written request of the Department, provide the facilities and necessary equipment (including instruments and sensing devices) and shall conduct tests, emission or ambient, for such periods of time as may be necessary using methods approved by the Department.

3. ARM 17.8.106 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by the Department, any source or other entity as required by any rule in this chapter, or any permit or order issued pursuant to this chapter, or the provisions of the Clean Air Act of Montana, 75-2-101, *et seq*., Montana Code Annotated (MCA).

   LCP shall comply with the requirements contained in the Montana Source Test Protocol and Procedures Manual, including, but not limited to, using the proper test methods and supplying the required reports. A copy of the Montana Source Test Protocol and Procedures Manual is available from the Department upon request.

4. ARM 17.8.110 Malfunctions. (2) The Department must be notified promptly by telephone whenever a malfunction occurs that can be expected to create emissions in excess of any applicable emission limitation or to continue for a period greater than four hours.

5. ARM 17.8.111 Circumvention. (1) No person shall cause or permit the installation or use of any device or any means that, without resulting in reduction of the total amount of air contaminant emitted, conceals or dilutes an emission of air contaminant that would otherwise violate an air pollution control regulation. (2) No equipment that may produce emissions shall be operated or maintained in such a manner as to create a public nuisance.

B. ARM 17.8, Subchapter 2 – Ambient Air Quality, including, but not limited to the following:

1. ARM 17.8.204 Ambient Air Monitoring
2. ARM 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide
3. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide
4. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide
5. ARM 17.8.213 Ambient Air Quality Standard for Ozone
6. ARM 17.8.214 Ambient Air Quality Standard for Hydrogen Sulfide
7. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter
8. ARM 17.8.221 Ambient Air Quality Standard for Visibility
9. ARM 17.8.222 Ambient Air Quality Standard for Lead
10. ARM 17.8.223 Ambient Air Quality Standard for PM_{10}

LCP must maintain compliance with the applicable ambient air quality standards.

C. ARM 17.8, Subchapter 3 – Emission Standards, including, but not limited to:

1. ARM 17.8.304 Visible Air Contaminants. This rule requires that no person may cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over six consecutive minutes.

2. ARM 17.8.308 Particulate Matter, Airborne. (1) This rule requires an opacity limitation of less than 20% for all fugitive emission sources and that reasonable precautions be taken to control emissions of airborne particulate matter. (2) Under this rule, LCP shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter.

3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This rule requires that no person shall cause, allow or permit to be discharged into the atmosphere particulate matter caused by the combustion of fuel in excess of the amount determined by this rule.

4. ARM 17.8.310 Particulate Matter, Industrial Process. This rule requires that no person shall cause, allow or permit to be discharged into the atmosphere particulate matter in excess of the amount set forth in this rule.

5. ARM 17.8.322 Sulfur Oxide Emissions--Sulfur in Fuel. (4) Commencing July 1, 1972, no person shall burn liquid or solid fuels containing sulfur in excess of 1 pound of sulfur per million Btu fired. (5) Commencing July 1, 1971, no person shall burn any gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions. LCP will burn natural gas in all fuel burning equipment, which will meet this limitation.

6. ARM 17.8.324 Hydrocarbon Emissions--Petroleum Products. (3) No person shall load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged fill pipe, unless such tank is equipped with a vapor loss control device as described in (1) of this rule.

7. ARM 17.8.340 Standard of Performance for New Stationary Sources and Emission Guidelines for Existing Sources. This rule incorporates, by reference, 40 CFR 60, Standards of Performance for New Stationary Sources (NSPS). This facility is not an NSPS affected source because it does not meet the definition of any NSPS subpart defined in 40 CFR 60.

8. ARM 17.8.342 Emission Standards for Hazardous Air Pollutants for Source Categories. The source, as defined and applied in 40 CFR 63, shall comply with the requirements of 40 CFR 63, as listed below:

   - 40 CFR 63, Subpart HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities. Owners or operators of oil and natural gas production facilities, as defined and applied in 40 CFR Part 63, shall comply with the applicable provisions of 40 CFR Part 63, Subpart HH.

   - 40 CFR 63, Subpart HHH National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities. Owners or operators of natural gas transmission or storage facilities, as defined and applied in 40 CFR Part 63, shall comply with the standards and provisions of 40 CFR Part 63, Subpart HHH.

   Based on the information submitted by LCP, the Signal Butte Compressor Station is not subject to the provisions of 40 CFR 63, Subpart HH or HHH because the facility is not a major source of HAPs.

D. ARM 17.8, Subchapter 5 – Air Quality Permit Application, Operation, and Open Burning Fees, including, but not limited to:

1. ARM 17.8.504 Air Quality Permit Application Fees. This rule requires that an applicant submit an air quality permit application fee concurrent with the submittal of an air quality permit application. A permit application is incomplete until the proper application fee is paid to the Department. LCP submitted the appropriate permit application fee for the current permit action.

2. ARM 17.8.505 When Permit Required--Exclusions. An annual air quality operation fee must, as a condition of continued operation, be submitted to the Department by each source of air contaminants holding an air quality permit (excluding an open burning permit) issued by the Department. The air quality operation fee is based on the actual or estimated actual amount of air pollutants emitted during the previous calendar year.

   An air quality operation fee is separate and distinct from an air quality permit application fee. The annual assessment and collection of the air quality operation fee, described above, shall take place on a calendar-year basis. The Department may insert into any final permit issued after the effective date of these rules, such conditions as may be necessary to require the payment of an air quality operation fee on a calendar-year basis, including provisions that prorate the required fee amount.

E. ARM 17.8, Subchapter 7 – Permit, Construction, and Operation of Air Contaminant Sources, including, but not limited to:

1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.

2. ARM 17.8.743 Montana Air Quality Permits--When Required. This rule requires a person to obtain an air quality permit or permit alteration to construct, alter, or use any air contaminant sources that have the Potential to Emit (PTE) greater than 25 tons per year of any pollutant. LCP has the PTE greater than 25 tons per year of NO_X, carbon monoxide (CO), and Volatile Organic Compounds (VOC); therefore, a permit is required.

3. ARM 17.8.744 Montana Air Quality Permits--General Exclusions. This rule identifies the activities that are not subject to the Montana Air Quality Permit program.

4. ARM 17.8.745 Montana Air Quality Permits--Exclusion for De Minimis Changes. This rule identifies the de minimis changes at permitted facilities that do not require a permit under the Montana Air Quality Permit Program.

5. ARM 17.8.748 New or Modified Emitting Units--Permit Application Requirements. (1) This rule requires that a permit application be submitted prior to installation, alteration, or use of a source. LCP submitted the required permit application for the current permit action. (7) This rule requires that the applicant notify the public by means of legal publication in a newspaper of general circulation in the area affected by the application for a permit. LCP submitted an affidavit of publication of public notice for the June 13, 2006, issue of the *Havre Daily News*, a newspaper of general circulation in the City of Havre in Hill County, as proof of compliance with the public notice requirements.

6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by the Department must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this

subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.

7. ARM 17.8.752 Emission Control Requirements. This rule requires a source to install the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be utilized. The required BACT analysis is included in Section III of this permit analysis.

8. ARM 17.8.755 Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by the Department at the location of the source.

9. ARM 17.8.756 Compliance with Other Requirements. This rule states that nothing in the permit shall be construed as relieving LCP of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq*.

10. ARM 17.8.759 Review of Permit Applications. This rule describes the Department's responsibilities for processing permit applications and making permit decisions on those permit applications that do not require the preparation of an environmental impact statement.

11. ARM 17.8.760 Additional Review of Permit Applications. This rule describes the Department's responsibilities for processing permit applications and making permit decisions on those applications that require an environmental impact statement.

12. ARM 17.8.762 Duration of Permit. An air quality permit shall be valid until revoked or modified, as provided in this subchapter, except that a permit issued prior to construction of a new or altered source may contain a condition providing that the permit will expire unless construction is commenced within the time specified in the permit, which in no event may be less than one year after the permit is issued.

13. ARM 17.8.763 Revocation of Permit. An air quality permit may be revoked upon written request of the permittee, or for violations of any requirement of the Clean Air Act of Montana, rules adopted under the Clean Air Act of Montana, the FCAA, rules adopted under the FCAA, or any applicable requirement contained in the Montana State Implementation Plan (SIP).

14. ARM 17.8.764 Administrative Amendment to Permit. An air quality permit may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. The owner or operator of a facility may not increase the facility's emissions beyond permit limits unless the increase meets the criteria in ARM 17.8.745 for a de minimis change not requiring a permit, or unless the owner or operator applies for and receives another permit in accordance with ARM 17.8.748, ARM 17.8.749, ARM 17.8.752, ARM 17.8.755, and ARM 17.8.756, and with all applicable requirements in ARM Title 17, Chapter 8, Subchapters 8, 9, and 10.

15. ARM 17.8.765 Transfer of Permit. This rule states that an air quality permit may be transferred from one person to another if written notice of Intent to Transfer, including the names of the transferor and the transferee, is sent to the Department.

F. ARM 17.8, Subchapter 8 – Prevention of Significant Deterioration of Air Quality, including, but not limited to:

1. ARM 17.8.801 Definitions. This rule is a list of applicable definitions used in this subchapter.

2. ARM 17.8.818 Review of Major Stationary Sources and Major Modifications--Source Applicability and Exemptions. The requirements contained in ARM 17.8.819 through ARM 17.8.827 shall apply to any major stationary source and any major modification, with respect to each pollutant subject to regulation under the FCAA that it would emit, except as this subchapter would otherwise allow.

This facility is not a major stationary source since this facility is not a listed source and the facility's PTE is below 250 tons per year of any pollutant (excluding fugitive emissions).

G. ARM 17.8, Subchapter 12 – Operating Permit Program Applicability, including, but not limited to:

1. ARM 17.8.1201 Definitions. (23) Major Source under Section 7412 of the FCAA is defined as any source having:

   a. PTE > 100 tons/year of any pollutant;

   b. PTE > 10 tons/year of any one HAP, PTE > 25 tons/year of a combination of all HAPs, or lesser quantity as the Department may establish by rule; or

   c. PTE > 70 tons/year of particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}) in a serious PM_{10} nonattainment area.

2. ARM 17.8.1204 Air Quality Operating Permit Program. (1) Title V of the FCAA amendments of 1990 require that all sources, as defined in ARM 17.8.1204(1), obtain a Title V Operating Permit. In reviewing and issuing Air Quality Permit #3345-02 for LCP, the following conclusions were made:

   a. The facility's PTE is less than 100 tons/year for any pollutant.

   b. The facility's PTE is less than 10 tons/year for and one HAP and less than 25 tons/year for all HAPs.

   c. This source is not located in a serious PM_{10} nonattainment area.

   d. This facility is not subject to any current NSPS.

   e. This facility is not subject to any current NESHAP standards.

   f. This source is not a Title IV affected source, nor a solid waste combustion unit.

   g. This source is not an EPA designated Title V source.

   Based on these facts, the Department determined that LCP would be a minor source of emissions as defined under Title V.

III. BACT Determination

A BACT determination is required for each new or altered source. LCP shall install on the new or altered source the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be utilized.

A BACT analysis was submitted by LCP in Permit Application #3345-02, addressing the available methods of controlling emissions from the sources used at the Signal Butte Compressor Station. The Department reviewed these methods, as well as previous BACT determinations in order to make the following BACT determinations.

A. Natural Gas Compressor Engine –

1. CO BACT

Identification of CO Control Options:

CO is a product of incomplete combustion. Reciprocating engines have the following types of CO control options:

1. Parametric controls (timing and operating at a leaner air-to fuel ratio)

2. Postcombustion catalytic controls:
   - Lean-burn – oxidation catalysts
   - Rich-burn – nonselective catalytic reduction (NSCR)

Eliminate Technically Infeasible CO Options:

Catalytic oxidation applied to a rich-burn is technically infeasible because the oxygen concentration from a rich-burn engine is not high enough for a catalytic oxidizer to operate properly. Excess oxygen is needed by the catalytic oxidizers to efficiently oxidize CO to CO_2.

An NSCR unit applied to a lean-burn or lean-burn retrofit engine is also technically infeasible because the NSCR unit needs a rich fuel-to-air ratio to operate effectively.

Rank Feasible CO Control Options:

Technically feasible control options, in order of the lowest CO emission rate to the highest CO emission rate:

Control Technology	% Control	CO Emission Rate (g/bhp-hr)
Lean-burn with Catalytic Oxidizer and AFR	70% - 90%	0.5
Lean-burn without Control	--	1.5
Rich-burn with NSCR and AFR	80% - 90%	2.0
Rich-burn without Control	--	8.0

The control methods listed above are widely used; these control options cannot be eliminated solely based on environmental or energy impacts. Lean-burn engines do emit relatively higher HAP (formaldehyde) emissions than rich-burn engines. Lean-burn engines cannot be eliminated based on higher formaldehyde emissions, but the higher formaldehyde emissions can affect the BACT determination.

Select CO BACT:

LCP proposes to utilize a lean-burn engine with an oxidation catalyst and an AFR controller, which is considered the most technically practicable and economically feasible control of CO from compressor engines. Based on past Department determinations, lean-burn natural gas compressor engines controlled with an oxidation catalyst and an AFR controller, meeting emission limits of 0.5 gram per brake horsepower-hour (g/bhp-hr) CO are considered BACT. Further, it has been demonstrated that these technologies, operated together, are capable of achieving the g/bhp-hr BACT emission limits established for the proposed compressor engine.

The BACT limit will be 0.5 g/bhp-hr for CO.

2. NO_X BACT

Identification of NO_x Control Options:

Essentially all NO_x formed in natural gas-fired reciprocating engines occurs through the thermal NO_x mechanism, which is mostly formed in high-temperature regions in the cylinder where combustion air has mixed sufficiently with the fuel. Maximum NO_x formation occurs near the stoichiometric air-to-fuel mixture ratio. Lean-burn engines typically have lower NO_x emissions than rich-burn engines. Reciprocating engines have the following types of NO_x control options:

1. Parametric controls (timing and operating at a leaner air-to fuel ratio)

2. Postcombustion catalytic controls:
   - Lean-burn – selective catalytic reduction (SCR)
   - Rich-burn – nonselective catalytic reduction (NSCR)

Eliminate Technically Infeasible Options:

SCR is not applied to rich-burn engines because oxygen in the exhaust is not high enough for an SCR to operate properly. Additionally, an SCR is not designed to operate on compressor engines that can expect variable load demands and rapid start and stop operation. Typical compressor engines operate at variable loads, thereby creating technical difficulties for SCR operation such as periods of ammonia skip or periods of insufficient ammonia injection. SCR units have not been installed on lean-burn compressor engines in Montana.

An NSCR unit applied to a lean-burn or lean-burn retrofit engine is also technically infeasible because the NSCR unit needs a rich fuel-to-air ratio to operate effectively.

Rank Feasible NO_x Control Options:

Technically feasible control options, in order of the lowest to the highest NO_x emission rate:

Control Technology	% Control	NO_X Emission Rate (g/bhp-hr)
Lean-burn with AFR	5% - 30%	1.0
Rich-burn with NSCR and AFR	90%	1.0
Lean-burn without Control	--	1.0 -2.0
Rich-burn without Control	--	16.0

The control methods listed above are widely used; these control options cannot be eliminated solely based on environmental or energy impacts.

Lean-burn engines do emit relatively higher HAP (formaldehyde) emissions than rich-burn engines. Lean-burn engines cannot be eliminated based on higher formaldehyde emissions, but the higher formaldehyde emissions can affect the BACT determination.

Select NO_x BACT:

Lean-burn engine technology with an AFR controller and rich-burn engines with NSCR and AFR are considered the two most technically feasible controls of NO_X from compressor engines. LCP proposes to utilize a lean-burn engine with an AFR controller. Based on past Department determinations, lean-burn natural gas compressor engines controlled with an AFR controller, meeting emission limits of 1.0 g/bhp-hr NO_X, are considered BACT. Further, it has been demonstrated that these technologies, operated together, are capable of achieving the g/bhp-hr BACT emission limits established for the proposed compressor engine.

The BACT limit will be 1.0 g/bhp-hr for NO_X.

3. VOC BACT

LCP proposed the use of an oxidation catalyst and an AFR controller to meet 0.5 g/bhp-hr. The Department determined that no additional controls and burning pipeline quality natural gas to meet an emission limit of 0.5 g/bhp-hr constitutes BACT for the proposed compressor engine. The Department is not aware of any BACT determinations that have required controls for VOC emissions from natural gas fired compressor engines.

4. PM_{10} and SO_2 BACT

The Department is not aware of any BACT determinations that have required controls for PM_{10} or sulfur dioxide (SO_2) emissions from natural gas fired compressor engines. LCP proposed no additional controls and burning pipeline quality natural gas as BACT for PM_{10} and SO_2 emissions from the proposed compressor engine. Due to the relatively small amount of PM_{10} and SO_2 emissions from the proposed engine, any add-on controls would be cost prohibitive. Therefore, the Department concurred with LCP's BACT proposal and determined that no additional controls and burning pipeline quality natural gas will constitute BACT for PM_{10} and SO_2 emissions from the compressor engine.

IV. Emission Inventory

Ton/year					
Source	PM_{10}	NO_X	VOC	CO	SO_X
380-hp Compressor Engine (EU1)	0.26	3.68	1.84	3.68	0.01
380-hp Compressor Engine (EU2)	0.26	3.68	1.84	3.68	0.01
380-hp Compressor Engine (EU3)	0.26	3.68	1.84	3.68	0.01
380-hp Compressor Engine (EU4)	0.26	3.68	1.84	3.68	0.01
1,341-hp Compressor Engine (EU5)	0.44	12.95	6.48	6.48	0.03
1,341-hp Compressor Engine (EU6)	0.44	12.95	6.48	6.48	0.03
Total	**1.92**	**40.62**	**20.32**	**27.68**	**0.10**

380-hp Rich-Burn Compressor Engines (4 Engines, EU1-EU4)
Brake Horsepower: 380 bhp
Hours of operation: 8,760 hr/yr

PM_{10} Emissions
Emission Factor: 0.0194 lb/MMBtu (AP-42, Chapter 3, Table 3.2-2, 7/00)
Fuel Consumption: 3.07 MMBtu/hr (Maximum Design)
Calculations: 3.07 MMBtu/hr * 0.0194 lb/MMBtu = 0.0596 lb/hr
0.0596 lb/hr * 8,760 hr/hr * 0.0005 ton/lb = 0.26 ton/yr

NO_X Emissions
Emission factor: 1.00 gram/bhp-hour (BACT Determination)
Calculations: 1.00 gram/bhp-hour * 380 bhp * 0.002205 lb/gram = 0.84 lb/hr
0.84 lb/hr * 8,760 hr/yr * 0.0005 ton/lb = 3.67 ton/yr

VOC Emissions
Emission factor: 0.50 gram/bhp-hour (BACT Determination)
Calculations: 0.50 gram/bhp-hour * 380 bhp * 0.002205 lb/gram = 0.42 lb/hr
0.42 lb/hr * 8,760 hr/yr * 0.0005 ton/lb = 1.84 ton/yr

CO Emissions
Emission factor: 1.00 gram/bhp-hour (BACT Determination)
Calculations: 1.00 gram/bhp-hour * 380 bhp * 0.002205 lb/gram = 0.84 lb/hr
0.84 lb/hr * 8,760 hr/yr * 0.0005 ton/lb = 3.67 ton/yr

SO_2 Emission
Emission factor: 5.88E-04 lb/MMBtu (AP-42, Chapter 3, Table 3.2-2, 7/00)
Fuel Consumption: 3.07 MMBtu/hr (Maximum Design)
Calculations: 3.07 MMBtu/hr * 5.88E-04 lb/MMBtu = 0.002 lb/hr
0.002 lb/hr * 8,760 hr/hr * 0.0005 ton/lb = 0.008 ton/yr

1,341-hp Lean-Burn Compressor Engines (2 Engines, EU5 & EU6)
Brake Horsepower: 1,341 bhp
Hours of operation: 8,760 hr/yr

PM_{10} Emissions
Emission Factor: 0.01 lb/MMBtu (AP-42, Chapter 3, Table 3.2-2, 7/00)
Fuel Consumption: 10.11 MMBtu/hr (Maximum Design)
Calculations: 10.11 MMBtu/hr * 0.01 lb/MMBtu = 0.10 lb/hr
0.10 lb/hr * 8,760 hr/hr * 0.0005 ton/lb = 0.44 ton/yr

NO_X Emissions
Emission factor: 1.00 gram/bhp-hour (BACT Determination)
Calculations: 1.00 gram/bhp-hour * 1,341 bhp * 0.002205 lb/gram = 2.96 lb/hr
2.96 lb/hr * 8,760 hr/yr * 0.0005 ton/lb = 12.95 ton/yr

VOC Emissions
Emission factor: 0.50 gram/bhp-hour (BACT Determination)
Calculations: 0.50 gram/bhp-hour * 1,341 bhp * 0.002205 lb/gram = 1.48 lb/hr
1.48 lb/hr * 8,760 hr/yr * 0.0005 ton/lb = 6.48 ton/yr

CO Emissions
Emission factor: 0.50 gram/bhp-hour (BACT Determination)
Calculations: 0.50 gram/bhp-hour * 1,341 bhp * 0.002205 lb/gram = 1.48 lb/hr
1.48 lb/hr * 8,760 hr/yr * 0.0005 ton/lb = 6.48 ton/yr

SO_2 Emission
Emission factor: 5.88E-04 lb/MMBtu (AP-42, Chapter 3, Table 3.2-2, 7/00)
Fuel Consumption: 10.11 MMBtu/hr (Maximum Design)
Calculations: 10.11 MMBtu/hr * 5.88E-04 lb/MMBtu = 0.01 lb/hr
0.01 lb/hr * 8,760 hr/hr * 0.0005 ton/lb = 0.03 ton/yr

V. Existing Air Quality

The LCP Signal Butte Compressor Station is located near the town of Havre, in the SE¼ of the SW¼ of Section 35, Township 37 North, Range 15 East, in Hill County, Montana. Hill County is unclassifiable/attainment for the National Ambient Air Quality Standards (NAAQS) for all criteria pollutants.

VI. Ambient Air Impact Analysis

The Department determined that the impact from this permitting action would be minor. The Department believes it will not cause or contribute to a violation of any ambient air quality standard.

VII. Taking or Damaging Implication Analysis

As required by 2-10-105, MCA, the Department conducted a private property taking and damaging assessment and determined there are no taking or damaging implications.

VIII. Environmental Assessment

An environmental assessment, required by the Montana Environmental Policy Act, was completed for this project. A copy is attached.

DEPARTMENT OF ENVIRONMENTAL QUALITY
Permitting and Compliance Division
Air Resources Management Bureau
P.O. Box 200901, Helena, Montana 59620
(406) 444-3490

FINAL ENVIRONMENTAL ASSESSMENT (EA)

Issued To: Lodge Creek Pipelines, LLC
Signal Butte Compressor Station
P.O. Box 40
Havre, MT 59501

Air Quality Permit number: 3345-02

Preliminary Determination Issued: July 18, 2006
Department Decision Issued: August 3, 2006
Permit Final: August 19, 2006

1. *Legal Description of Site*: LCP – Signal Butte Compressor Station is located in Hill County, Montana, near the town of Havre. The legal description is the SE¼ of the SW¼ of Section 35, Township 37 North, Range 15 East, in Hill County, Montana.

2. *Description of Project*: LCP proposes to construct and operate an additional lean-burn engine having a maximum rated design capacity up to 1,341 hp with an oxidation catalyst and an AFR controller for the compression and transportation of natural gas.

3. *Objectives of Project*: The proposed project would provide business and revenue for LCP by facilitating the gathering and selling of natural gas from the nearby gas field. Natural gas would be received and the LCP – Signal Butte Compressor Station would compress the gas for transmission through a natural gas pipeline.

4. *Alternatives Considered*: In addition to the proposed action, the Department also considered the "no-action" alternative. The "no-action" alternative would deny issuance of the Montana Air Quality Permit to the proposed facility. However, the Department does not consider the "no-action" alternative to be appropriate because LCP demonstrated compliance with all applicable rules and regulations as required for permit issuance. Therefore, the "no-action" alternative was eliminated from further consideration.

5. *A Listing of Mitigation, Stipulations, and Other Controls*: A list of enforceable conditions, including a BACT analysis, would be included in Permit #3345-02.

6. *Regulatory Effects on Private Property*: The Department considered alternatives to the conditions imposed in this permit as part of the permit development. The Department determined that the permit conditions are reasonably necessary to ensure compliance with applicable requirements and demonstrate compliance with those requirements and do not unduly restrict private property rights.

7. The following table summarizes the potential physical and biological effects of the proposed project on the human environment. The "no-action" alternative was discussed previously.

		Major	Moderate	Minor	None	Unknown	Comments Included
A	Terrestrial and Aquatic Life and Habitats			X			Yes
B	Water Quality, Quantity, and Distribution			X			Yes
C	Geology and Soil Quality, Stability, and Moisture			X			Yes
D	Vegetation Cover, Quantity, and Quality			X			Yes
E	Aesthetics			X			Yes
F	Air Quality			X			Yes
G	Unique Endangered, Fragile, or Limited Environmental Resources			X			Yes
H	Demands on Environmental Resource of Water, Air, and Energy			X			Yes
I	Historical and Archaeological Sites			X			Yes
J	Cumulative and Secondary Impacts			X			Yes

SUMMARY OF COMMENTS ON POTENTIAL PHYSICAL AND BIOLOGICAL EFFECTS: The following comments have been prepared by the Department.

A. Terrestrial and Aquatic Life and Habitats

Minor impacts to terrestrial and aquatic life and habitats would be expected from the proposed project because deer, antelope, coyotes, geese, ducks, and other terrestrials would potentially use the area around the additional engine and because the additional engine would be a source of air pollutants. The additional engine would emit air pollutants and corresponding deposition of pollutants would occur; however, as described in Section 7.F. of this EA, the Department determined that any impacts from deposition would be minor. In addition, minor land disturbance would occur through additional engine construction activities. Any impacts from the additional engine construction would be minor due to the relatively small size of the project and the relatively short period of time required for construction. Overall, any impacts to terrestrial and aquatic life and habitats would be minor.

B. Water Quality, Quantity, and Distribution

Minor impacts would be expected on water quality, quantity, and distribution from the proposed project. The additional engine would have no discharges into surface water. However, minor amounts of water may be required to control fugitive dust emissions from the access roads and the general facility property. In addition, the additional engine would emit air pollutants and corresponding deposition of pollutants would occur. However, as described in Section 7.F. of this EA, the Department determined that any impact resulting from the deposition of pollutants on water quality, quantity, and distribution would be minor.

Further, water quality, quantity, and distribution would not be impacted from constructing the additional engine because there is no surface water at or relatively close to the site. Furthermore, no direct discharges into surface water would occur and no use of surface water would be expected for the additional engine construction. Overall, any impacts to water quality, quantity, and distribution would be minor.

C. Geology and Soil Quality, Stability, and Moisture

Minor impacts would occur on the geology and soil quality, stability, and moisture from the proposed project because minor construction on approximately one acre would be required to install the additional engine. No discharges, other than air emissions, would occur at the facility. Deposition of pollutants would occur; however, as described in Section 7.F of this EA, the Department determined that any impacts resulting from the deposition of pollutants on the soils surrounding the site would be minor. Any impacts to the geology and soil quality, stability and moisture from the additional engine construction would be minor due to the relatively small size of the project.

D. Vegetation Cover, Quantity, and Quality

Minor impacts would occur on vegetation cover, quantity, and quality because minor construction on approximately one acre would be required to install the additional engine. No discharges, other than air emissions, would occur at the facility. The additional engine would be a source of air pollutants and corresponding deposition of pollutants would occur. However, as described in Section 7.F of this EA, the Department determined that any impacts resulting from the deposition of pollutants on the existing vegetation cover, quantity, and quality would be minor. Overall, any impacts to the vegetation cover, quantity, and quality from the additional engine construction would be minor due to the relatively small size of the project.

E. Aesthetics

Minor impacts would result on the aesthetic values of the area because of the addition of an engine to the facility. However, any visual aesthetic impacts would be minor because the addition is a relatively small addition to an existing industrial facility.

The additional engine would also create additional noise in the area. However, any auditory aesthetic impacts would be minor because the compressor engines would be required to operate enclosed indoors and with an oxidation catalyst. Oxidation catalysts are typically designed to be installed in mufflers. Overall, any aesthetic impacts would be minor.

F. Air Quality

The air quality of the area would realize minor impacts from the proposed project because the additional engine would emit the following air pollutants: NO_X; CO; VOC, including HAPs; and very minor amounts of PM_{10} and sulfur oxides (SO_X). Air emissions from the engine would be minimized by limitations and conditions that would be included in Permit #3345-02. Conditions would include, but would not be limited to, BACT emission limits and opacity limitations on the proposed engine and the general facility.

In addition, based on previous analysis of sources of this type operating under similar conditions, the Department believes that the emissions resulting from the proposed engines exhibit good dispersion characteristics resulting in relatively low deposition impacts. While deposition of pollutants would occur as a result of operating the additional engine, the Department determined that the impacts from deposition of pollutants would be minor due to dispersion characteristics of pollutants (stack height, stack temperature, etc.), the atmosphere (wind speed, wind direction, ambient temperature, etc.), and conditions that would be placed in Permit #3345-02. The air concentration of pollutants would be relatively small, and the corresponding deposition of those air pollutants would be minor.

G. Unique Endangered, Fragile, or Limited Environmental Resources

In an effort to identify any unique endangered, fragile, or limited environmental resources in the area, the Department contacted the Montana Natural Heritage Program, Natural Resource Information System (NRIS). In this case, the area was defined by the section, township, and range of the proposed location with an additional 1-mile buffer zone. The NRIS did not find any unique, endangered, fragile, or limited environmental resources near the proposed site. Due to the minor amounts of construction that would be required and the relatively low levels of pollutants that would be emitted, the Department determined that it would be unlikely that the proposed project would impact any species of special concern and that any potential impacts would be minor.

H. Demands on Environmental Resource of Water, Air, and Energy

The proposed project would have minor impacts on the demands for the environmental resources of air and water because the additional engine would be a source of air pollutants. Deposition of pollutants would occur as a result of operating the additional engine; however, as explained in Section 7.F of this EA, the Department determined that any impacts on air and water resources from the pollutants (including deposition) would be minor. Since controlled emissions from the proposed station would exhibit good dispersion characteristics and would not exceed any Montana ambient air quality modeling threshold, the Department determined that controlled emissions from the source will not cause or contribute to a violation of any ambient air quality standard. Therefore, any impacts to air quality from the proposed additional engine would be minor.

The proposed project would be expected to have minor impacts on the demand for the environmental resource of energy because power would be required at the site. The impact on the demand for the environmental resource of energy would be minor because the additional engine would be relatively small by industrial standards. Overall, the impacts for the demands on the environmental resources of water, air, and energy would be minor.

I. Historical and Archaeological Sites

In an effort to identify any historical and archaeological sites located near the proposed project area, the Department contacted the Montana Historical Society, State Historic Preservation Office (SHPO). According to SHPO records, there are no previously recorded historic or archaeological sites within the proposed area. However, SHPO stated that the absence of cultural properties in the area does not mean that they do not exist, but may reflect a lack of previous cultural resource inventories in the area, because SHPO records indicate no previous inventories were conducted. Overall, the Department determined that the chance of the project impacting any historical and archaeological sites in the area would be minor due to the relatively small size of the project.

J. Cumulative and Secondary Impacts

Overall, the cumulative and secondary impacts on the physical and biological aspects of the human environment in the immediate area would be minor due to the relatively small size of the project and little construction activities associated with this type of additional engine. The Department believes that this additional engine could be expected to operate in compliance with all applicable rules and regulations as would be outlined in Permit #3345-02.

Additional facilities (compressor stations, gas plants, etc.) could locate in the area to withdraw natural gas from the nearby area and/or to separate the components of natural gas. However, any future facilities would be required to apply for and receive the appropriate permits from the appropriate regulating authority. Environmental impacts from any future facilities would be assessed through the appropriate permitting process.

8. The following table summarizes the potential economic and social effects of the proposed project on the human environment. The "no-action" alternative was discussed previously.

		Major	Moderate	Minor	None	Unknown	Comments Included
A	Social Structures and Mores				X		Yes
B	Cultural Uniqueness and Diversity				X		Yes
C	Local and State Tax Base and Tax Revenue			X			Yes
D	Agricultural or Industrial Production			X			Yes
E	Human Health			X			Yes
F	Access to and Quality of Recreational and Wilderness Activities			X			Yes
G	Quantity and Distribution of Employment				X		Yes
H	Distribution of Population				X		Yes
I	Demands for Government Services			X			Yes
J	Industrial and Commercial Activity			X			Yes
K	Locally Adopted Environmental Plans and Goals				X		Yes
L	Cumulative and Secondary Impacts			X			Yes

SUMMARY OF COMMENTS ON POTENTIAL ECONOMIC AND SOCIAL EFFECTS: The following comments have been prepared by the Department:

A. Social Structures and Mores
B. Cultural Uniqueness and Diversity

The proposed project would not have an impact on social and economic resources in the area. The proposed project would take place in a relatively remote location. Further, the operation of an additional engine does not require any additional employees, and would not result in any immigration of new people to the area for employment purposes; thereby, having no impact on the social and cultural resources of the area.

C. Local and State Tax Base and Tax Revenue

The proposed project would result in minor impacts to the local and state tax base and tax revenue as a result of constructing and operating the additional engine. The proposed project would necessitate relatively little construction and typically would not require an extended period of time for completion. Therefore, any construction related jobs would be temporary and any corresponding impacts on the tax base/revenue in the area would be minor. Overall, any impacts to the local and state tax base would be minor.

D. Agricultural or Industrial Production

The area surrounding the site is grazing land. Since the construction activities associated with the addition of a new engine would be relatively small (approximately one acre), the proposed project would result in only minor impacts to agricultural production.

Additional facilities (compressor stations, gas plants, etc.) could locate in the area to withdraw natural gas from the nearby area and/or to separate the components of natural gas. However, any future facility would be required to apply for and receive the appropriate permits from the appropriate regulating authority. Environmental impacts from any future facilities would be assessed through the appropriate permitting process. Overall, any impacts to agricultural or industrial production of the area would be minor.

E. Human Health

The proposed project would result in minor, if any, impacts to human health. As explained in Section 7.F of this EA, deposition of pollutants would occur; however, the Department determined that the proposed project would comply with all applicable air quality rules, regulations, and standards. These rules, regulations, and standards are designed to be protective of human health. Overall any impacts to public health would be minor.

F. Access to and Quality of Recreational and Wilderness Activities

The proposed project would have minor, if any, impacts on access to recreational and wilderness activities because of the relatively remote location and the relatively small size of the additional engine. The proposed project would have minor impacts on the quality of recreational and wilderness activities in the area because the additional engine, while relatively small by industrial standards, would be visible and would produce noise. Overall any impacts to the access to and quality of recreational and wilderness activities in the area would be minor.

G. Quantity and Distribution of Employment
H. Distribution of Population

The proposed project would have no impact on the employment and population of the area because no permanent employees would be required for normal operations. Furthermore, construction activities would be minor and not require the addition of any employees. There should be no change in the quantity and distribution of employment or population resulting from this project.

I. Demands for Government Services

There would be minor impacts on the demands for government services because additional time would be required by government agencies to issue Permit #3345-02 and, in the future, to assure compliance with applicable rules, standards, and conditions that would be contained in Permit #3345-02. Overall, any demands for government services to regulate the additional engine or activities associated with the facility would be minor due to the relatively small size of the facility.

J. Industrial and Commercial Activity

Only minor impacts would be expected on the local industrial and commercial activity because the proposed project would represent only a minor increase in the industrial and commercial activity in the area. The proposed project would be relatively small and would take place at a relatively remote location.

Additional facilities (compressor stations, gas plants, etc.) could locate in the area to withdraw natural gas from the nearby area and/or to separate the components of natural gas. However, any future facility would be required to apply for and receive the appropriate permits from the appropriate regulating authority. Environmental impacts from any future facilities would be assessed through the appropriate permitting process. Overall, any impacts to the local industrial and commercial activity of the area would be minor.

K. Locally Adopted Environmental Plans and Goals

The Department is unaware of any locally adopted environmental plans or goals. The permit would ensure compliance with state standards and goals.

L. Cumulative and Secondary Impacts

Overall, cumulative and secondary impacts from this project would result in minor impacts to the economic and social aspects of the human environment in the immediate area. Due to the relatively small size of the project, the industrial production, employment, and tax revenue (etc.) impacts resulting from the proposed project would be minor. In addition, the Department believes that this additional engine could be expected to operate in compliance with all applicable rules and regulations as would be outlined in Permit #3345-02.

Additional facilities (compressor stations, gas plants, etc.) could locate in the area to withdraw natural gas from the nearby area and/or to separate the components of natural gas. However, any future facility would be required to apply for and receive the appropriate permits from the appropriate regulating authority. Environmental impacts from any future facilities would be assessed through the appropriate permitting process.

Recommendation: No EIS is required.

The current permitting action is for the construction and operation of an additional engine. Permit #3345-02 includes conditions and limitations to ensure the facility will operate in compliance with all applicable rules and regulations. In addition, there are no significant impacts associated with this proposal.

Other groups or agencies contacted or which may have overlapping jurisdiction: Montana Historical Society – State Historic Preservation Office, Natural Resource Information System – Montana Natural Heritage Program

Individuals or groups contributing to this EA: Department of Environmental Quality – Air Resources Management Bureau, Montana Historical Society – State Historic Preservation Office, Natural Resource Information System – Montana Natural Heritage Program

EA prepared by: Christine Weaver
Date: June 15, 2006